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8 WELLS FARGO & COMPANY
9 and WELLS FARGO BANK, N.A.

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 JESSICA L. STOCK, SOFIA SIORIS,
LUKE HARTSOCK, JERRY
13 WINIARSKI, and TRACY VINCENT,
Individually and On Behalf of All
14 Others Similarly Situated,

15 Plaintiff,

16 vs.

17 WELLS FARGO & COMPANY;
WELLS FARGO BANK, N.A.; and
18 EARLY WARNING SERVICES, LLC
D/B/A ZELLEPAY.COM,

19 Defendants.
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Case No. 8:22-cv-00763-DOC-ADS

Hon. David O. Carter

**STIPULATION REGARDING
BRIEFING SCHEDULE FOR
DEFENDANTS' MOTIONS IN
RESPONSE TO PLAINTIFFS'
FIRST AMENDED COMPLAINT**

Action Filed: April 5, 2022

Trial Date: None Set

22 Plaintiffs JESSICA L. STOCK, SOFIA SIORIS, LUKE HARTSOCK,
23 JERRY WINIARSKI, and TRACY VINCENT ("Plaintiffs") and Defendants
24 WELLS FARGO & COMPANY and WELLS FARGO BANK, N.A. ("Wells Fargo
25 Defendants") and Defendant Early Warning Services, LLC ("EWS") (collectively,
26 the "Parties") hereby stipulate as follows:

27 WHEREAS, on April 5, 2022, Plaintiff Stock filed a complaint in the above-
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1 referenced case;

2 WHEREAS, Plaintiffs filed a First Amended Complaint on July 22, 2022;

3 WHEREAS, pursuant to this Court's Order (Dkt. No. 39), the Wells Fargo
4 Defendants' and EWS's deadline to respond to Plaintiffs' First Amended Complaint
5 is presently September 20, 2022;

6 WHEREAS, the Wells Fargo Defendants intend to file motions to compel
7 arbitration as to each of the five named Plaintiffs' claims (for a total of five motions
8 to compel), and Plaintiffs intend to oppose each of the five motions to compel
9 arbitration;

10 WHEREAS, EWS intends to file a motion to dismiss Plaintiffs' First
11 Amended Complaint and reserves all rights to move to compel arbitration and/or to
12 join the Wells Fargo Defendants' forthcoming motions to compel arbitration once
13 filed;

14 WHEREAS, the Parties have agreed, subject to this Court's approval, to a
15 briefing schedule to govern Defendants' respective motions, in order to provide the
16 Parties and the Court with an orderly briefing schedule and sufficient time regarding
17 the motions;

18 WHEREAS, no other deadlines will be affected by this stipulation;

19 WHEREFORE, subject to this Court's approval, the Parties stipulate as
20 follows:

21 1. The Wells Fargo Defendants' deadline to answer, move, or otherwise
22 respond to the First Amended Complaint shall be extended to September 27, 2022,
23 by which date, if the date is approved by the Court, the Wells Fargo Defendants
24 intend to file separate motions to compel arbitration as to each of the five named
25 Plaintiffs' claims;

26 2. EWS will file its motion to dismiss Plaintiffs' First Amended
27 Complaint by the existing September 20, 2022 deadline. In the event EWS decides
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1 to join the Wells Fargo Defendants' forthcoming motions to compel arbitration,
 2 EWS will do so on or before October 11, 2022;

3 3. Plaintiffs' Oppositions to the motions filed by EWS and the Wells
 4 Fargo Defendants shall be due by November 4, 2022;

5 4. Plaintiffs' Opposition to EWS' joinder, if any, to the Wells Fargo
 6 Defendants' Motions shall be due by November 11, 2022;

7 5. Defendants' Replies in support of their respective motions shall be due
 8 by November 18, 2022;

9 6. The Wells Fargo Defendants shall notice their motions to compel
 10 arbitration for hearing on December 5, 2022;

11 7. EWS shall notice its motion to dismiss for hearing on December 12,
 12 2022;

13 8. This stipulation will not affect any other deadlines in this case;

14 9. This stipulation is without prejudice to the rights, claims, arguments
 15 and defenses of all parties.

16 **IT IS SO STIPULATED.**

17 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the ECF filer of this joint stipulation,
 18 Rebecca S. Saelao, attests that all other signatories listed below, and on whose behalf
 19 the filing is submitted, concur in the filing's content and have authorized the filing.

20 DATED: September 16, 2022 SEVERSON & WERSON
 21 A Professional Corporation

22 By: /s/ Rebecca S. Saelao
 23 REBECCA S. SAELAO
 24 Attorneys for Defendants WELLS FARGO &
 25 COMPANY and WELLS FARGO BANK, N.A.

26 DATED: September 16, 2022 KAZEROUNI LAW GROUP, APC

27 By: /s/ Jason A. Ibey
 28

JASON A. IBEY
ABBAS KAZEROUNIAN
Attorneys for Plaintiffs STOCK and SIORIS

DATED: September 16, 2022 KELLER ROHRBACK LLP

By: /s/ Laura Gerber
LAURA GERBER
Attorneys for Plaintiffs HARTSOCK and
WINIARSKI

DATED: September 16, 2022 SAUDER SCHELKOPF LLC & KAZEROUNI
LAW GROUP, APC

By: /s/ Jason A. Ibey
JOSEPH G. SAUDER
ABBAS KAZEROUNIAN
JASON A. IBEY
Attorneys for Plaintiff Vincent

DATED: September 16, 2022 STROOCK & STROOCK & LAVAN LLP

By: /s/ Christopher R. Fredrich
CHRISTOPHER R. FREDRICH
Attorneys for Defendant EARLY WARNING
SERVICES, LLC